

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

TIFFANY ROCKELLE SMITH an individual,	)	
PIPER ROCKELLE INC.	)	
a California corporation. AND PIPER ROCKELLE)	)	
SMITH A Minor by her parent and guardian	)	
Tiffany Rockelle Smith.	)	
Plaintiff,	)	
v.	)	No.
	)	
ANGELA SHARBINO, an individual, YVONNE	)	
DOUGHER, an individual, MARIA MEKKUS, an	)	
individual, CARLA HAAS, an individual,	)	
JENNIFER BRYANT, an individual, HEATHER	)	
TRIMMER, an individual, STEPHENIE AREECO,	)	
an individual, TANIA HARRISON, an individual,	)	
AMBER CAIN, an individual, and ASHLEY	)	
ANNE-ROCK SMITH, an individual.	)	
Defendants.	)	

**RICO STATEMENT**

Pursuant to the Racketeer Influence and Corruption Organizations Act (“Rico”) 18 U.S.C. Section 1961 the following statement is being filed and served upon the Defendants within twenty (20) days of filing the Pleadings asserting the Rico Claim.

1. The unlawful conduct is a violation of 18 U.S.C. section 1962(c) and (d).
2. The Defendant, Angela Sharbino created a Google drive which she has admitted to “momsvsmith@gmail.com.” The purpose of this drive was to solicit others in a conspiracy to lie and bring down the “Rockelles” Tiffany Smith and her daughter Piper Rockelle Smith.
3. The Defendants and each of them participated in a conspiracy to make false statements against Tiffany Smith and each used the wire and the internet to create and further the conspiracy to defraud, defame, and to extort money from the Plaintiff in violation of 18 U.S. C. section 1343 Wire Fraud Statute. The Defendants and each of them conspired using the internet and the wire to willfully defame, extort, and injure the Plaintiff and her 14-year-old daughter by creating egregious, false allegations of sexual battery. False allegations that they knew were detrimental enough so that Defendants could attempt to

extort money from the Plaintiff. The conspiracy planned initially by Angela Sharbino to get others to lie by soliciting them to participate in a conspiracy using a Google drive that she admittedly created. She Stated

*Please trust me. Those stories will cause the most embarrassment and make them cancel her and them can't make money anymore. Harmeet will help you. The reply was I'll think about it, Guys I just don't know. Sharbino replied: "will you do it for Theresa then if not Tiffany? She lies constantly why should you care about doing the same? Reply I'll Think About it." Sharbino stated "We have to stick together to take down the Rockelles."*

As part of the conspiracy, once Sharbino got the parties named as defendants herein, each defendant upon information and belief paid \$10,000 to an attorney to bring among other claims, a false claim of sexual battery in the Superior Court of Los Angeles, case number 22 STCV 01351 to extort money from the Plaintiff. In addition, publicize the allegation to get the enterprise of Piper Rockelle Smith Inc. demonetized. Thus, preventing the enterprise from receiving between \$300,000 - \$500,000 per month in advertising revenue. To then extort money from the Plaintiff to settle the case to avoid lost revenue. This was the plan and each of the Defendants participated.

4. Tiffany Rockelle Smith is the mother of Piper Rockelle Smith a minor who is engaged as an influencer on the internet. Piper Rockelle Inc is a California corporation that was created to collect revenue from the Internet postings. All Plaintiffs were damaged and lost \$300,000- \$500,000 a month due to the Sexual Battery false claim which was made to demonetize the Plaintiffs from YouTube advertising revenue. YouTube demonetized the Plaintiffs because of the alleged sexual battery charge made in a civil complaint which was born out of a conspiracy to use wire and the internet to spawn a false allegation against Tiffany Rockelle Smith, Piper's mother to achieve that objective. The Plaintiffs were denied an estimated \$10,000,000 from a long history of steady advertising revenue they had enjoyed through their hard labor creating internet postings on YouTube. The Plaintiffs will be seeking punitive damages. Tiffany Rockelle Smith had an irreparable harm to reputation and will be claiming \$10,000,000 as a result plus punitive damage.
5. The Defendants Racketeering enterprise, had more than two predicate acts of wire fraud and internet fraud of creating a conspiracy to allege false accusations against Tiffany Rockelle Smith to injure her and her enterprise Piper Rockelle Inc. and her minor daughter Piper Rockelle Smith. The effect on interstate commerce has been profound and

were canceled, London venue declined to allow a concert, and a venue in Cincinnati attempted to pull out of commitment to host a concert. Advertisers who use the internet and utilize the influencer Piper Rockelle Smith, who has 10 million followers, were deprived of their audience to view their advertisements.

6. The Pendent claim on behalf of Tiffany Rockelle Smith is Defamation. Injury to reputation of Tiffany Rockelle Smith through the conspiracy to allege sexual battery by her. No sexual battery existed; it was a false claim. It was made with the intent to get Piper Rockelle Inc. demonetized from YouTube. The false allegation caused ridicule and shame to Tiffany Rockelle Smith and damaged her enterprise.
7. The Defendants and each of them have children who participated in Piper's videos on YouTube and her concerts. Their parents saw or heard about how she grew to 10 million subscribers and was able to purchase a three-million-dollar house. The thought they would like to do that to. So, they created their own enterprises to participate in internet influencing and wrongfully utilized the wire, and the internet to defraud, extort, and defame Plaintiff's so that they can get an unfair advantage in the endeavors of their enterprises. Instead of working hard and creating original content, they decided to knock Piper out from YouTube and try to fill in the gap with their postings to drive viewership to them so they could enjoy the advertising revenue. The more followers you have the greater the audience for advertisers. The Defendants in their conspiracy had a plan to file a complaint with false allegations and extort money from the Plaintiffs and their enterprise.

Respectfully submitted,

**RONALD L. BELL & ASSOCIATES, P.C.**

*Ronald L. Bell*

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